

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

<p>JEFF BROWN, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>3M COMPANY and AEARO TECHNOLOGIES LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 20-cv-02643-JRT-KMM</p>
<p>CASEY BAKER, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>3M COMPANY and AEARO TECHNOLOGIES LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 21-cv-00100-JRT-KMM</p>
<p>CYNTHIA CLERK, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>3M COMPANY and AEARO TECHNOLOGIES LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 20-cv-02691-JRT-KMM</p>

MOTION TO REMAND FOR LACK OF SUBJECT MATTER JURISDICTION

Plaintiffs, by and through counsel, hereby move this Court for an order remanding these cases to Minnesota State Court, Fourth Judicial District, Hennepin County.

This Motion is based on the pleadings, files and records herein, including Plaintiffs' Consolidated Memorandum of Law filed in support of this Motion.

Dated: January 21, 2021

Respectfully submitted,

/s/Daniel E. Gustafson

Daniel E. Gustafson (#202241)

Amanda M. Williams (#341691)

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: (612) 333-8844

dgustafson@gustafsongluek.com

awilliams@gustafsongluek.com

William R. Sieben (#100808)

Alicia N. Sieben (#389640)

Matthew J. Barber (#397240)

SCHWEBEL GOETZ & SIEBEN, P.A.

5120 IDS Center

80 South Eighth Street

Minneapolis, Minnesota 55402-2246

Tel: (612) 377-7777

bsieben@schwebel.com

asieben@schwebel.com

mbarber@schwebel.com

Richard M. Paul III
Ashlea G. Schwarz
PAUL LLP
601 Walnut Street, Suite 300
Kansas City, Missouri 64106
Tel: (816) 984-8100
Rick@PaulLLP.com
Ashlea@PaulLLP.com

Attorneys for Plaintiffs